

DAVID CHIU, State Bar #189542
City Attorney
YVONNE R. MERÉ, State Bar #173594
Chief Deputy City Attorney
TARA M. STEELEY, State Bar #231775
JOHN H. GEORGE, State Bar #292332
KAITLYN M. MURPHY, State Bar #293309
ABIGAIL H. WALD, State Bar #309110
Deputy City Attorneys
City Hall, Room 234
1 Dr. Carlton B. Goodlett Place
San Francisco, California 94102-4682
Telephone: (415) 554-4655 (Steeley)
(415) 554-4223 (George)
(415) 554-6762 (Murphy)
(415) 554-3901 (Wald)
Facsimile: (415) 554-4699
E-Mail: tara.steeley@sfcityatty.org
john.george@sfcityatty.org
kaitlyn.murphy@sfcityatty.org
abigail.wald@sfcityatty.org

Attorneys for Defendant
CITY AND COUNTY OF SAN FRANCISCO

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JANE ROE, an individual; MARY ROE, an individual; SUSAN ROE, an individual; JOHN ROE, an individual; BARBARA ROE, an individual; PHOENIX HOTEL SF, LLC, a California limited liability company; FUNKY FUN, LLC, a California limited liability company; and 2930 EL CAMINO, LLC, a California limited liability company,

Plaintiffs,

vs.

CITY AND COUNTY OF SAN FRANCISCO, a California public entity,

Defendant.

Case No. 4:24-cv-01562-JST

DECLARATION OF LISA RACHOWICZ IN SUPPORT OF DEFENDANT CITY AND COUNTY OF SAN FRANCISCO'S OPPOSITION TO PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

Hearing Date: October 27, 2025
Time: 8:30 a.m.
Place: Courtroom 6, 2nd Floor
1301 Clay Street
Oakland, CA 94612

Trial Date: August 10, 2026

Attachments: Exhibit A

1 I, Lisa Rachowicz, declare:

2 1. I have personal knowledge of the matters stated herein, and if called and sworn as a
3 witness could and would competently testify thereto.

4 2. I am the Division Director of Outreach and Temporary Shelter for the San Francisco
5 Department of Homelessness and Supportive Housing (“HSH”). I have been in this position since
6 March 2024. Prior to becoming Division Director, I was the Manager of Navigation Centers and
7 Shelter Programs for the period between November 2020 and March 2024, the Navigation Centers
8 Program Manger between August 2018 and November 2020, and a Senior Behavioral Health Clinician
9 between February 2016 and August 2018. I am also a Licensed Clinical Social Worker with the
10 California Board of Behavioral Sciences and obtained a Master’s in Social Work from the University
11 of California, Berkeley.

12 3. As Division Director of Outreach and Temporary Shelter, part of my responsibilities
13 include leading HSH’s response to street homelessness. I help manage the day-to-day operations of
14 HSH’s outreach, shelter, and other temporary housing projects, which includes, but is not limited to
15 providing direct oversight of outreach, shelter, and navigation center operations, as well as developing
16 strategic direction, in coordination with the executive team, for outreach and shelter programs within
17 the continuum of care. Based upon my oversight responsibilities, I am familiar with temporary shelter
18 options available to people experiencing homelessness in San Francisco.

19 4. The Cova hotel has closed and was turned back over to its owner, Chin International,
20 on March 31, 2025.

21 5. The City’s lease for the Monarch hotel ends on March 31, 2026. At this time, the City
22 does not have any plans to renew the lease.

23 6. The City’s lease for the Adante hotel ends on March 31, 2026. The Adante is currently
24 being used for unhoused persons as a short term stay until long term residencies can be established in
25 other locations. The Adante acts as an immediate intervention to move unhoused persons off of the
26 street and into treatment services. The Department of Public Health is onsite at the Adante in order to
27 offer treatment.

1 7. 685 Ellis Street currently operates as a semi-congregate shelter.

2 8. The Planning Code of San Francisco was specifically amended for the Cova, Monarch
3 and Adante to re-establish their use as a hotel. This was done because each of these properties
4 responded to the needs of the unhoused population during the Covid pandemic and leased temporary
5 housing to the City for the unhoused. The City amended the Planning Code so that the owners of the
6 properties had the ability to efficiently return the properties to tourist use. Attached hereto as **Exhibit**
7 **A** is a true and correct copy of the ordinance regarding the amendment.

8 I declare under penalty of perjury under the laws of the United States and the State of
9 California that the foregoing is true and correct.

10 Executed on September 19, 2025, at San Francisco, California.

11 *Lisa Rachowicz*
12 Lisa Rachowicz
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